

LANE POWELL PC

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January 26, 2005

Law Offices

VIA E-MAIL AND U.S. MAIL

James B. King, Esq.
Keefe King & Bowman, PS
601 West Main, Suite 1102
Spokane, WA 99201-0625

Re: Zlotnick v. Workland & Witherspoon, et al.

Dear Jim:

Thank you for your recent notice of substitution of counsel. We look forward to working with you on this case. Enclosed please find the following:

1. Plaintiff's first discovery requests to Workland & Witherspoon
2. Plaintiff's first discovery requests to Gregory and Jane Doe Lipsker
3. Notice of 30(b)(6) Deposition and Exhibit "A" thereto

You will note that we have set the 30(b)(6) deposition for March 1, 2005, at 9:30 a.m., at your office. If this date, time, or location is inconvenient, please let us know and we will reschedule the deposition. Thank you for your anticipated cooperation.

Very truly yours,

LANE POWELL PC


Matthew J. Macario

MJM:mjm

Enclosures

cc (w/enc): Albert M. Zlotnick
James B. Stoetzer, Esq.

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